UNITED STATES DISTRICT COURT 1 2 NORTHERN DISTRICT OF CALIFORNIA 3 SAN FRANCISCO DIVISION 4 IN RE GOOGLE PLAY STORE Case No. 3:21-md-02981-JD 5 ANTITRUST LITIGATION [PROPOSED] ORDER RE: GOOGLE'S 6 ADMINISTRATIVE MOTION TO FILE THIS DOCUMENT RELATES TO: **UNDER SEAL** 7 Epic Games, Inc. v. Google LLC et al., Case No. 3:20-cv-05671-JD 8 Judge James Donato 9 In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD 10 State of Utah et al. v. Google LLC et al., Case No. 3:21-cv-05227-JD 11 12 Match Group, LLC et al. v. Google LLC et al., Case No. 3:22-cv-02746-JD 13 Having considered Google's Administrative Motion to File Under Seal certain limited 14 portions of an exhibit (PX-170) to the January 12, 2023 Deposition of Tian Lim (MDL Dkt. No. 15 16 449-2), the Declaration of Tian Lim submitted in support of this administrative motion, and any materials submitted in support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5; 17 IT IS HEREBY ORDERED: 18 The following portions of PX-170 may be filed under seal: 19 20 21 22 23

Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
Page -362 (text between "s" and "return to", between "dr d" and "/dei", between "j" and "+", between "+ p" and "mitby," between "v" and "-declines", between "pm - m" and "w", between "w" and "? Disappointed," between "m" and "-process", between "s" and "0%")	Lim Decl.¶ 2	
Page -363 (text between "sure s" and "aligned", between "to r" and "(v easy", between "for s" and "to IM",	Lim Decl.¶ 2	

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1 2	between "to r" and "/p", between "/p" and "how", between "c" and "-how")		
3	Page -364 (text between "with r"	Lim Decl.¶ 2	
4 5	and "/p", between "/p" and "s", between "s" and "has pinged",		
	between "work with" and "and", between "and" and "to ensure",		
6	between "random s" and "feedback",		
7	between "b" and "ready", between "ready s" and "s", between "s" and		
8	"- will")		
9	Page - 365 (text between "/ c" and "/	Lim Decl.¶ 2	
10	p", between "/ p" and "- solve", between "S" and "- play", between "s" and "piracy")		
11		Lim Deal # 2	
12	Page - 366 (text between "s" and "what", between "- k" and "- exec", between "pf" and "- android",	Lim Decl.¶ 2	
14	between "p" and "- s", between "- s"		
	and "feedback")		
15	Page - 367 (text between "- a" and "- good", between "- d" and "needs",	Lim Decl.¶ 2	
16	between "- y" and "- pf", between "-		
17	d" and "- runway", between "a" and "/k", between "/k" and "thinking",		
18	between "-a" and "?", between "a" and "1", between "k" and "/m".		
19	between "/m" and "- free", between		
20	"s" and "/play", between "- h" and "/ s", between "/ s" and "- 'so",		
21	between "s" and "20210106",		
22	between "m" and "privacy")	Lim De 100	
23	Page - 368 (text between "a" and "on", between "s" and "-	Lim Decl.¶ 2	
24	org/culture", between "d" and "can", between "j" and "- dont")		
25	Page - 369 (text between "- k" and	Lim Decl.¶ 2	
26	"- exec", between "m" and "s team")	2 2 2	
27	Page - 370 (text between "s" and "/ hgpw", between "a" and "- not",	Lim Decl.¶ 2	
28			

1 2 3 4 5	between "s" and "- jalwa", between "- j" and "- worried", between "-p" and "nog", between "m" and "- buyflow", between "- k" and "- getting", between "- v" and "/c", between "/c" and "/b", between "/b" and "(?)", between "p" and "to", between "- b" and ": going", between "- b" and "should")		
6 7 8 9 10 11 12 13 14 15 16	Page - 371 (text between "h" and "play", between "s" and "d", between "d" and "- stress", between "- c" and "can't", between "s" and "foo", between "to s" and "/t", between "/t" and "first", between "abt s" and "to", between "c" and ". shit", between "I" and "to", between "c" and ". you", between "- d" and ", I", between ", I" and ", c", between ", r" and "- felt", between "so s" and "/a", between "/a" and "disengaged", between "a" and "disengaged", between "a" and "d", between "d" and "- d", between "- d" and ": ejc", between "v" and "going", between "- c" and ": d", between ": d" and "rubbing", between "v" and "mmh", between "m" and "?")	Lim Decl.¶ 2	
17 18 19 20	Page - 372 (text between "s" and "-d", between "-d" and "et", between "w s" and "/s", between "/s" and "-cros", between "-s" and "+9", between "-s" and "-existential", between "-j" and "-the", between "to S" and "s points")	Lim Decl.¶2	
21 22 23	Page - 373 (text between "d" and "-strategy", between "spotify/s" and "-new", between "-s" and "existing", between "clover/s" and "-status", between "runway/s" and "-?", between "-j" and ":was")	Lim Decl.¶2	
 24 25 26 27 28 	Page - 374 (text between "j" and "s team.", between "- m" and "- need", between "j" and "s", between "s" and "/cl", between "- t" and "- ATC", between "betw h" and "+ m", between "+ m" and "- debug", between "w g" and "h", between "h" and "- d", between "- d" and "-	Lim Decl.¶ 2	

1 2	s", between "-s" and "- pms", between "w s" and "- GTM")	
3	Page 375 (text between "s" and "-play", between "s" and	Lim Decl.¶ 2
4	"passdowns", between "s" and "whatsapp", between "- e" and ", bluetooth", between "butl" and "F",	
5 6	between "d" and "- a", between "-a" and "took")	
7	Page - 376 (text between "a" and "m", between "- d" and	Lim Decl.¶ 2
8	"adversarial", between "-a" and "speaking", between "at s" and "?",	
9	between "s" and "passdowns", between "- m" and "joining", between "s" and "'s team", between	
10	"- s" and "/g", between "/g" and "updating")	
11	Page - 377 (text between "k" and "-	Lim Decl.¶ 2
13	redone", between "n" and "- collab", between "s" and "- s", between "-s" and "/c", between "/c" and "not")	
14	Page - 378 (text between "s" and "/h", between "/h" and "/r", between	Lim Decl.¶ 2
15	"/r" and "last", between "- s" and "said")	
16 17	Page - 379 (text between "s" and "-feedback", between "-p" and	Lim Decl.¶ 2
18	"mail", between "m" and "/p", between "/p" and "/mmh", between	
19	"/mmh/t" and "/r", between "/r" and "- b", between "- b" and "g",	
20	between "g" and ", j", between ", j" and ", j", between ", j" and ", ss", between ", ss" and ", apps")	
21	Page - 380 (text between "j" and "r",	Lim Decl.¶ 2
22	between "r" and "- GTM")	V: D 150
23	Page - 381 (text between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M"	Lim Decl.¶ 2
24 25	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday",	
26	between "j" and "is", between "s" and "tmw", between "A" and "M",	
27	between "M" and ", Yesterday", between "T" and "L", between "L" and ", Yesterday")	
28	and, 1 esterday)	

1	Page - 382 (text between "A" and	Lim Decl.¶ 2
2	"M", between "M" and ", Yesterday", between "T" and "L",	
3	between "L" and ", Yesterday", between "h" and "somewhere",	
4	between "A" and "M", between "M" and ", Yesterday", between "T" and	
5	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
6	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday",	
7	between "A" and "M", between "M" and ", Yesterday")	
8	Page - 383 (text between "T" and	Lim Decl.¶ 2
9	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
10	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday",	
11	between "A" and "M", between "M" and ", Yesterday", between "T" and	
12	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
13	and ", Yesterday", between "T" and "L", between "L" and", Yesterday")	
14	Page - 384 (text between "A" and	Lim Decl.¶ 2
15	"M", between "M" and ", Yesterday")	
16	Page - 385 (text between "T" and "L", between "L" and ", Yesterday",	Lim Decl.¶ 2
17	between "A" and "M", between "M"	
18	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday")	
19	Page - 386 (text between "A" and "M", between "M" and ",	Lim Decl.¶ 2
20	Yesterday", between "T" and "L", between "L" and ", Yesterday",	
21	between "A" and "M", between "M"	
22	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M"	
23	and ", Yesterday", between "T" and	
24	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
25	and ", Yesterday", between "s" and "/h", between "/h" and "this")	
26	Page - 387 (text between "T" and "L" between "I" and "Vesterday"	Lim Decl.¶ 2
27	"L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday", between "A" and	
28	and, residinay, between A and	

1 2	"M", between "M" and ", Yesterday")	
3	Page - 388 (text between "G" and "H", between "H" and "Yesterday",	Lim Decl.¶ 2
4	between "A" and "M", between "M" and ", Yesterday", between "H" and	
5	"and", between "s" and "'s head", between "G" and "H", between "H"	
6	and ", Yesterday", between "A" and "M", between "M" and ",	
7	Yesterday", between "H" and "wants", after "a")	
8	Page - 389 (text between "s" and "come", between "d" and "(and",	Lim Decl.¶ 2
9	between "- j" and "/d", between "/d" and "- appbundles", between "- d"	
10	and "/d", between "/d" and "uncomfortable", between "-d" and	
12	": 'this") Page - 390 (text between "H" and	Lim Decl.¶ 2
13	"did", between "T" and "L", between "L" and ", Yesterday",	Elifi Deci. 2
14	between "A" and "R", between "R" and ", Yesterday", between "A" and	
15	"R", between "R" and "n,". between "A" and "R", between "R" and ",	
16	6:33")	Lin De 102
17 18	Page - 391 (text between "w" and "- privacy", between "p" and "?", between "k" and " - focus")	Lim Decl.¶ 2
19	Page - 392 (text between "s" and "ar/fb", between "D" and "L",	Lim Decl.¶ 2
20	between "L" and ", 4", between "D" and "L", between "L" and ", 1",	
21	between "l", and "d", between "d" and "/blizzard", between "g" and	
22	"c", between "c" and "n", between "n" and "/opg")	
23	Page - 393 (text between "D" and "-uber", between "r" and "-s",	Lim Decl.¶ 2
24	between "- s" and "- too", between "h" and "feedback", between "T"	
25	and "L", between "L" and ", 8")	
26	Page - 394 (text between "J" and "H", between "H" and ", 6",	Lim Decl.¶ 2
27	between "T" and "L", between "L" and ", 4", between "p" and "f",	
28		<u> </u>

1	between "f" and "is", between "J"		
2	and "H", between "H" and ", 3", between "P" and "has", between "T"		
3	and "L", between "L" and ", 3", between "J" and "H", between "H"		
4	and ", 3" between "E" and "on", between "P" and "it", between "A"		
5	and ", who", between "T" and "L", between "L" and ", 1", between "a"		
6	and "is", between "J" and "H", between "H" and ", 1", between "P"		
7	and "would")		
8	Page - 395 (text between "T" and "L", between "L" and", Now",	Lim Decl.¶ 2	
9	between "it." and "H", between "H" and ", 17", between "T" and "L", between "L" and ", 15", between "J"		
10	and "H", between "H" and ", 14", between "M" and ", and", between		
11	"A" and "And", between "P" and "is", between "T" and "L", between		
12	"L" and ", 13", between "p" and "take", between "J" and "H",		
13	between "H" and ", 13")		
14	Page - 396 (text between "P" and "on", between "T" and "L", between	Lim Decl.¶ 2	
15	"L" and ", 12", between "p" and "plays", between "p" and		
16	"notwithstanding", between "p" and "in", between "v" and "/p", between		
17	"/p" and "anyways", between "J" and "H", between "H" and ", 10",		
18	between "E" and "on", between "J" and "H", between "H" and ", 2",		
19	between "T" and "L", between "L" and ", 2")		
20	Page - 397 (text between "j" and	Lim Decl ¶ 2	
21	"p", between "p" and "https://",	Lim Decl.¶ 2	
22	between "s" and "march", between "s" and "io.", between "-s" and "/s", between "/s" and "/d" between "/d"		
23	between "/s" and "/d", between "/d" and "/sf", between "/sf" and "")		
24	Page - 398 (text between "S" and "tablet" between "dd" and "traise")	Lim Decl.¶ 2	
25	"tablet", between "dd" and ": raise")	Lim Deal # 2	
26	Page - 399 (text between "s" and "store", between "(K" and "with",	Lim Decl.¶ 2	
27	between "d" and "(growth)", between "j" and "(commerce)",		
28	between "c" and "(ads)", between		

1 2 3 4	"(K" and "with", between "d" and "(growth)", between "j" and "(commerce)", between "c" and "(ads)", between "K" and "&", between "e" and "(UXD)", between "b" and "(UXR)", between "- D" and ")", between "(M" and ") The")		
5 6 7	Page - 400 (text between "- a" and "- launching", between "s" and "directs", between "s" and ", moderation")	Lim Decl.¶ 2	
8 9 10 11 12 13 14	Page - 401 (text between "S" and "B*", between "m" and "- hc", between "- a" and "- amazing", between "- k" and "needs", between "- t" and "doing", between "t" and "/k", between "/k" and "haggling", between "- d" and "/s", between "/s" and "top", between "- y" and "strong", between "- g" and "- fine", between "- a" and "- less", between "- m" and "- super")	Lim Decl.¶ 2	
15 16 17 18 19 20 21	Page - 402 (text between "- d" and "- v", between "- a" and "stuff", between "(b" and ". phonesky", between "(t" and ")", between "- m" and ": creating", between "- y" and "rearrange", between "- m" and "/h", between "/h" and "relationship", between "-j" and "trying", between "j" and "gave", between "- m" and "never", after "to m")	Lim Decl.¶ 2	
22 23 24 25 26 27 28	Page - 403 (text between "p" and "f", between "f" and "to", between "a" and ", p", between ", p" and ", k", between ", k" and "get", between "d" and "- serious", between "d" and "onboarded", between "d" and "DEI", between "ml" and ", g", between ", g" and ", j", between ", j" and "ch", between "ch" and ", a", between ", a" and "n", between "n" and ", m", between ", m" and "b",	Lim Decl.¶ 2	

1 2 3 4	between "b" and ", j", between ", j" and "k", between "k" and ")", between "k" and "/pf", between "g" and "/a", between "/a and "shine")		
5 6 7 8	Page -404 (text between "with p" and "@", between "p" and "and i", between "with p" and "ran roundtables", between "such as d" and "t", between "t" and "founders", between "and g" and "is sufficiently")	Lim Decl.¶ 2	
9 10 11 12 13 14	Page -405 (text between "a" and "m", between "a" and "/t", between "/t" and "/s", between "/s" and "- overtly", between "mmh - m" and "m" and "working", between "asked a" and "to be quiet", between "m" and "hadn't", between "is a" and "partnering", between "w d" and "?", between "c" and "- subs")	Lim Decl.¶2	
15 16 17 18 19 20	Page -406 (text between "g" and "rant", between "to D" and "last time", between "mean if D" and "wants", between "T" and "L", between "L" and ", Yesterday 7:36", between "say g" and "is a", between "A" and "M", between "M" and ", Yesterday", between "was s" and "s pointing", between "ask r" and "for feedback")	Lim Decl.¶ 2	
 21 22 23 24 25 26 27 38 	Page -407 (text between "thing. s" and "is there", between "but g" and "is not", between "b" and "/ r", between "/ r" and "/ d", between "/ d" and "/ s", between "/ s" and "have been", between "a" and "for the", between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday", between "M" and ", Yesterday", between "pingd a" and "for his", between "T" and "L", between "L"	Lim Decl.¶ 2	

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1 2	and ", Yesterday 7:42", between "A" and "M", between "M" and ", Yesterday 7:50")		
3 4 5 6 7 8 9	Page -408 (text between "Per r" and "No feedback", between "that S" and "basically", between "A" and "M", between "M" and ", Yesterday 8:01", between "A" and "M", between "M" and ", Yesterday 8:12", between "a" and "gut", between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday 8:17")	Lim Decl.¶ 2	
10 11 12 13	Page -409 (text between "minimum s" and "/a", between "/a" and "who run", between "Per r" and "No feedback", between "that S" and "basically", between "l" and "lib arts").	Lim Decl.¶ 2	
14 15	Page -410 (text between "s" and "/salesforce")	Lim Decl.¶ 2	
16 17 18	Page -411 (text between "- p" and ": conviction", between "priorities s" and "/s", between "/s" and "/play", between "s" and "passdowns")	Lim Decl.¶ 2	
19 20 21 22 23	Page -412 (text between "s" and "-pf", between "when s" and "not there", between "p" and "asked question", between "s" and ": dont expect", between "s" and "i just have", between "pb/k" and "were", between "s" and ": what", between "s" and ": you")	Lim Decl.¶ 2	
24	Page -413 (text between "-v" and "-go build")	Lim Decl.¶ 2	
252627	Page -414 (text between "does m" and "zoom", between "d" and "-strong", between "c" and ":indifference")	Lim Decl.¶ 2	

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1	Page -417 (text between "a" and	Lim Decl.¶ 2	
2	"notes")		
3	Page -418 (text between "j" and "j", between "j" and "feedback",	Lim Decl.¶2	
5	between "h" and "I worked", between "with J" and "awhile",		
6	between "on R" and "T", between "T" and "and myself", between "R"		
7	and "worked", between "with J" and "R", between "R" and "would,		
8	between "with J" and ".", between		
9	"b" and "s", between "s" and "Yes", between "drove B" and "nuts",		
10	between "H" and "was on", between "r" and "l", between "l" and "Yes",		
11	between "Mr. J" and ". He")		
12	Page -419 (text between "g" and "/devmktg", between "G" and "H",	Lim Decl.¶ 2	
13	between "H" and ", 19 min", between "through K" and ")",		
14	between "j" and "s", between "s" and "etc.", between "k" and "->		
15	LA", between "r" and ", boston", between "T" and "L", between "L"		
16	and "33 min", between "K" and G",		
17	between "G" and ", 17 min", between "T" and "L", between "L"		
18	and ", 16 min")		
19	Page -420 (text between "K" and "G", between "G" and "16 min",	Lim Decl.¶ 2	
20	between "K" and "G", between "G" and "14 min", between "T" and "L",		
21	between "L" and "12 min", between		
22	"K" and "G", between "G" and "7 min", between "T" and "L", between		
23	"L" and "5 min", between "K" and "G", between "G" and "5 min",		
24	between "T" and "L", between "L" and "4 min", between "K" and "G",		
25	between "G" and "1 min", between "A" and "B", between "B" and "and		
26	F", between "and F" and "L", between "L" and ". R", between ".		
27	R" and "and I", between "A" and		
28			

1 2 3 4 5	"and F", between "and F" and "are primary", between "will be L" and "K", between "K" and "and K", between "and K" and "S", between "S" and ". T", between ". T" and "is supporting", between "role R" and "and I").		
6 7 8 9 10	Page -422 (text between "a" and "[geist]", between "now l" and ")", between "k" and ", m", between "m" and ", s", between "s" and ", m", between "m" and "d", between "d" and "not self", between "from s" and "anymore", between "h" and "me/m", between "me/m" and "-structure")	Lim Decl.¶ 2	
11 12 13 14 15	Page -424 (text between "L" and "convo", between "T" and "L", between "L" and "11:48", between "L" and "Z", between "Z" and "1:05", between "T" and "L", between "L" and "1:13", between "L" and "Z", between "Z" and "55 min")	Lim Decl.¶ 2	
16 17 18 19	Page -425 (text between "T" and "L", between "L" and "50 min", between "L" and "Z", between "Z" and "50 min", between "L" and "Z", between "Z" and "40 min")	Lim Decl.¶ 2	
20 21 22 23 24	Page -426 (text between "T" and "L", between "L" and "38 min", between "L" and "Z", between "Z" and "35 min", between "T" and "L", between "L" and "33 min", between "L" and "Z", between "Z" and "33 min", between "L" and "Z", between "Z" and "31 min", between "L" and "Z", between "Z" and "31 min", between "L" and "Z", between "Z" and "28 min")	Lim Decl.¶ 2	
25 26 27 28	Page -427 (text between "T" and "L", between "L" and "24 min", between "L" and "Z", between "Z" and "23 min", between "T" and "L", between "L" and "22 min", between	Lim Decl.¶ 2	

1	"L" and "Z", between "Z" and "21	
2	min", between "L" and "Z", between "Z" and "13 min")	
3 4	Page -428 (text between "T" and "L", between "L" and "9 min",	Lim Decl.¶ 2
5	between "L" and "Z", between "Z" and "9 min", between "T" and "L", between "L" and "7 min")	
6 7	Page -429 (text between "L" and	Lim Decl.¶ 2
8	"Z", between "Z" and "6 min", between "T" and "L", between "L" and "5 min", between "L" and Z",	
9	between "Z" and "4 min", between "T" and "L", between "L" and "3	
10 11	min", between "L" and "Z", between "Z" and "2 min", between "p" and	
12	"p", between "p" and "P", between "P" and "manages", between "T"	
13	and L", between "L" and "Now", between "L" and "Z", between "Z"	
14	and "Now")	Lim Dool ¶ 2
15	Page -430 (text between "s" and "4 priorities", between "wear/r" and "play", between "changes/t" and	Lim Decl.¶ 2
16 17	"testimony", between "p" and "foldables", between "ss" and "hc	
18	ask", between "sit w s" and "t", between "t" and "one company",	
19	between "h" and "update", between "s" and "next")	
20	Page -431 (text between "regression,	Lim Decl.¶ 2
21	e" and "issues", between "b" and "ready", between "t" and "to try",	
22	between "m" and "devrel")	
23		
24	Dated:, 2023	
25		Honorable James Donato United States District Judge
26 27		Northern District of California
28		
20	12 [PROPOSED] ORDER GRANTING GOOGLE'S ADMIN. MOT. TO FILE UNDER SEAL	